

## REMARKS

By the present invention, Claims 1, 4, 8, 12, 14 and 15 have been amended, Claims 9 and 13 have been canceled, and Claims 16-21 have been newly added. Claims 1-8, 10-12 and 14-21 remain pending in the present application. Claims 1, 8 and 16 are independent claims.

Applicant respectfully submits that the amendments to the claims are fully supported by the original disclosure, and introduce no new matter therewith. Applicant respectfully requests reconsideration and allowance in view of the foregoing amendments and the following remarks.

### ***35 U.S.C. § 102(e) Rejection based on Chrisop et al.***

1. Claims 1-7 are rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Chrisop et al. (U.S. Patent Application Publication No. US 2001/0025343 A1). Applicant respectfully traverses this rejection.

Amended independent Claim 1 recites a method of making information contents of memory cells of a volatile semiconductor memory irretrievable. The method generates a digital pattern, overwrites the information contents of memory cells with a pattern based upon the digital pattern a first time at a first rate, and overwrites the information contents of memory cells with a pattern based upon the digital pattern at least a second time at a second rate greater than the first rate.

Chrisop et al. describes a method and apparatus for preventing unauthorized access to information temporarily stored in memory. Chrisop et al. stores information to memory,

conducts an operation on the information, and automatically overwrites the information one or more times with a bit mask. Bit masks may be non-random or random sequences of binary numbers.

The Office states that Chrisop et al. teaches the claimed first step of generating a digital pattern in paragraph 37, lines 14-18 and paragraph 44, lines 11-17, and the claimed second step of overwriting the information contents with the digital pattern at least two times in paragraph 44, lines 17-19. Applicant respectfully submit that Chrisop et al., at a minimum, fails to teach overwriting the information contents of memory cells with a pattern based upon the digital pattern at least a second time at a second rate greater than the first rate.

It is well known that for a reference to anticipate a claim under 35 U.S.C. § 102(e) there must be no difference between the claimed invention and the reference disclosure, as viewed by a person of ordinary skill in the field of the invention. See *Scripps Clinic & Research Foundation v. Genentech Inc.*, 18 USPQ 2d 1001, 1010 (Fed. Cir. 1991). The application of Chrisop et al. by the Office fails to meet this criteria, and Claim 1 is allowable over Chrisop et al.

Claims 2-7 are allowable as being dependent from an allowable claim.

Applicant respectfully requests reconsideration and withdrawal of the rejection of Claims 1-7 under 35 U.S.C. § 102(e) as being anticipated by Chrisop et al.

***35 U.S.C. § 103(a) Rejection based on Kleijne and Chrisop et al.***

2. Claims 8-12 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over (U.S. Patent No. 4,593,384) in view of Chrisop et al. The cancellation of Claim 9 renders

this rejection moot with respect to this particular claim. Applicant appreciates the indication by the Office that Claims 13-15 would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims.

In this regard, Applicant has amended independent Claim 8 to incorporate the limitations of Claim 13 and intervening Claim 9, and respectfully submits that Claim 8 is allowable.

Claims 10-12 are allowable as being dependent from an allowable claim.

Applicant respectfully requests reconsideration and withdrawal of the rejection of Claims 8-12 under 35 U.S.C. § 103(a) as being unpatentable over Kleijne in view of Chrisop et al.

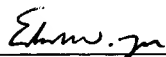
***Added Claims***

3. Claim 16 is similar to Claim 8 and is, accordingly, allowable. Claims 17-21 variously depend from Claim 16 and are allowable as being dependent from an allowable claim.

4. For the foregoing reasons, Applicant respectfully submits that the present application is in condition for allowance. If such is not the case, the Examiner is requested to kindly contact the undersigned in an effort to satisfactorily conclude the prosecution of this application.

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Respectfully submitted,



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